

# EXHIBIT A

Date	ID	Matter	Timekeeper	LCode	A Code	Description	Billable Hrs	Non Bill Hrs	Value	Rate
10/29/2024	101839	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery	1A104 Review/i	Initial review and analysis of Plaintiff's Rule 37 discovery motion.	1.30	0.00	\$390.00	\$300.00
10/29/2024	101286	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Kerrie Murphy	L350 Discovery	1A104 Review/i	Review Plaintiff's Motion to Compel and Motion for Sanctions, Brief and Declaration in support.	0.80	0.00	\$240.00	\$300.00
10/30/2024	101826	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Anthony Jackson	L120 Analysis/St	A104 Review/i	Review Plaintiff's Motion for Sanctions and Motion to Compel to strategize a response.	2.10	0.00	\$525.00	\$250.00
11/1/2024	103214	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Anthony Jackson	L110 Fact Investi	A104 Review/i	Review Plaintiff's Motion for Sanctions and in the alternative Motion to Compel, and the supportive exhibits to strategize a response.	3.00	0.00	\$750.00	\$250.00
11/3/2024	108262	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Anthony Jackson	L120 Analysis/St	A104 Review/i	Continue to review Plaintiff's exhibits within Plaintiff's Motion for Sanctions and in the alternative Motion to Compel, to strategize response, 125 plus pages.	1.50	0.00	\$375.00	\$250.00
11/3/2024	107923	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Anthony Jackson	L120 Analysis/St	A105 Commur	Strategize with legal team to response to Plaintiff's Motion for Sanctions and in the alternative Motion to Compel.	1.30	0.00	\$325.00	\$250.00
11/3/2024	104784	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery	1A104 Review/i	Detailed review of and annotations to Plaintiff's Rule 37 Motion (28 pages), beginning review of 239 pages declaration and declaration exhibits in support of the same, including and fact and discovery issues raised therein.	4.20	0.00	\$1,260.00	\$300.00
11/4/2024	108406	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L320 Document	A104 Review/i	Review and attend to outstanding discovery matters, including issues raised during meet and confer sessions and status of potential supplemental productions.	2.60	0.00	\$780.00	\$300.00
11/5/2024	108592	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Anthony Jackson	L120 Analysis/St	A104 Review/i	Analyze the Defendants' discovery responses and discovery related correspondence referenced in Plaintiff's Motion for Sanctions to ensure answers are compliant with the federal rules in comparison to Plaintiff's Motion for Sanctions and in the alternative Motion to Compel.	1.40	1.00	\$350.00	\$250.00
11/6/2024	104255	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Anthony Jackson	L320 Document	A103 Draft/rev	Continue to draft response to Plaintiff's Motion to Compel and in the alternative Motion for Sanctions regarding alleged bad faith.	4.50	2.50	\$1,125.00	\$250.00
11/6/2024	103837	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Anthony Jackson	L110 Fact Investi	A103 Draft/rev	Draft response to Plaintiff's Motion for Sanctions and Motion to Compel Discovery regarding alleged bad faith.	3.20	0.00	\$800.00	\$250.00
11/6/2024	103737	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Anthony Jackson	L110 Fact Investi	A105 Commur	Strategize with Attorney Buliox regarding response to Plaintiff's Motion to Compel and Motion for Sanctions.	0.30	0.00	\$75.00	\$250.00
11/8/2024	104256	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Anthony Jackson	L320 Document	A103 Draft/rev	Continue to draft response to Plaintiff's Motion to Compel and in the alternative Motion for Sanctions regarding alleged intentional spoliation.	3.20	2.80	\$800.00	\$250.00
11/10/2024	105617	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery	1A103 Draft/rev	Provide comments and direction on, and simultaneously draft portions of, Brief in Opposition to Plaintiff's Rule 37 Motion for Sanctions relating to the issues of compliance with local rule 37, alleged spoliation and arguments against the same, and allegations relating to communications from or between various parties.	4.10	0.00	\$1,230.00	\$300.00
11/10/2024	104836	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Anthony Jackson	L320 Document	A103 Draft/rev	Continue to draft response to Plaintiff's Motion to Compel and Motion for Sanctions. Review case law relating to gamesmanship and bad faith in the context of Rule 37 motions to compel for the purpose of both continued preparations of response to Plaintiff's Rule 37 Motion and Rule 37 Motion against Plaintiff.	2.50	0.00	\$625.00	\$250.00
11/12/2024	105680	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery	1A104 Review/i	Draft Background section of Rule 37 Motion to Compel against Plaintiff. Work included simultaneous review of case history, discovery responses and discovery related communications, including good faith meet and confer efforts.	1.40	0.00	\$420.00	\$300.00
11/12/2024	105623	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L310 Written Dis	A103 Draft/rev	Draft legal arguments sections of Rule 37 Motion to Compel against Plaintiff.	3.80	0.00	\$1,140.00	\$300.00
11/13/2024	105685	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery	1A103 Draft/rev	Continued drafting of legal argument sections of Rule 37 Motion to Compel against Plaintiff.	3.70	0.00	\$1,110.00	\$300.00
11/14/2024	105693	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery	1A103 Draft/rev	Analyze with Attorney Murphy additional items to potentially include in Rule 37 Motion to Compel against Plaintiff.	3.70	0.00	\$1,110.00	\$300.00
11/14/2024	105691	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery	1A104 Review/i	Review, analyze and annotate declaration and supporting documents of opposing counsel in support of Plaintiff's Rule 37 Motion for purpose of responding to the same.	1.10	0.00	\$330.00	\$300.00
11/15/2024	108386	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery	1A104 Review/i	Review, edit and provide comment and direction on outline of arguments (along with beginning arguments) in opposition to Plaintiff's Rule 37 Motion.	2.10	0.00	\$630.00	\$300.00
11/15/2024	105439	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Kerrie Murphy	L250 Other Writ	A103 Draft/rev	Continue drafting response to Plaintiff's Motion to Compel relating to intent and alleged bad faith.	0.70	0.00	\$210.00	\$300.00
11/18/2024	108166	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery	1A104 Review/i		1.10	0.00	\$330.00	\$300.00
11/19/2024	108175	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery	1A103 Draft/rev		1.90	0.00	\$570.00	\$300.00
11/19/2024	106118	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Anthony Jackson	L320 Document	A103 Draft/rev		3.20	0.00	\$800.00	\$250.00

11/20/2024	108383	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery M A103 Draft/rev	Edit and draft portions of spoliation argument for Brief in Opposition to Plaintiff's Rule 37 Motion.	3.80	0.00	\$1,140.00	\$300.00
11/20/2024	106509	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Anthony Jackson	L320 Document A103 Draft/rev	Continue drafting Defendants' response to Plaintiff's Motion to Compel and Motion for Sanctions relating to ESI.	4.50	0.00	\$1,125.00	\$250.00
11/21/2024	106834	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Anthony Jackson	L320 Document A103 Draft/rev	Continue to draft argument to Plaintiff's Motion to Compel an Inspection of Withheld ESI and for additional response to Production of Document Request Number 10.	5.10	0.00	\$1,275.00	\$250.00
11/22/2024	108390	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery M A103 Draft/rev	For Brief in Opposition to Plaintiff's Rule 37 Motion, draft arguments relating to alleged spoliation, specifically focusing arguments relating to statutes and regulations concerning record retention.	2.90	0.00	\$870.00	\$300.00
11/22/2024	107873	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery M A104 Review/i	For Brief in Opposition to Plaintiff's Rule 37 Motion, review and analyze fact issues and allegations relating to alleged failure to preserve evidence.	3.20	0.00	\$960.00	\$300.00
11/23/2024	107871	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery M A103 Draft/rev	For Brief in Opposition to Plaintiff's Rule 37 Motion, draft arguments relating to alleged spoliation, specifically focusing on the duty to preserve for each of the Defendants and statutes and regulations Plaintiff cites are creating a duty to preserve.	3.60	0.80	\$1,080.00	\$300.00
11/23/2024	106851	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Anthony Jackson	L120 Analysis/St A105 Commur	Develop further arguments on the issue of spoliation in response to Plaintiff's Motion to Compel and Motion for Sanctions with Attorney Buliox.	0.70	0.00	\$175.00	\$250.00
11/24/2024	107890	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery M A104 Review/i	Review, edit and provide comment and direction on draft Brief in Opposition to Plaintiff's Rule 37 Motion (approximately 43 pages of briefing).	3.30	2.00	\$990.00	\$300.00
11/24/2024	106987	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Anthony Jackson	L120 Analysis/St A104 Review/i	Analyze Plaintiff's Motion to Compel and Motion for Sanctions to ensure allegations within responsive brief have been addressed.	0.30	0.00	\$75.00	\$250.00
11/24/2024	106932	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Anthony Jackson	L120 Analysis/St A105 Commur	Continue to develop response strategy with Attorney Buliox on Plaintiff's Motion to Compel and Motion for Sanctions.	0.70	0.00	\$175.00	\$250.00
11/25/2024	107899	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery M A103 Draft/rev	For Defendants' Brief in Opposition to the Rule 37 Motion, draft and edit arguments, and provide comments and additional direction to the legal team, relating to the standard of review, the duty to preserve and the five threshold requirements for a spoliation charge as it relates to each defendant.	4.50	0.00	\$1,350.00	\$300.00
11/25/2024	107894	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery M A106 Commur	Call with City Mayor regarding discovery related issues and response to Rule 37 Motion.	0.20	0.00	\$60.00	\$300.00
11/26/2024	107910	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery M A104 Review/i	For Opposition to Rule 37 Motion, review and analyze issues relating to allegations of discovery deficiencies. Work included simultaneous review of discovery requests (greater than 10 pages), discovery responses (greater than 50 pages) and email correspondence between counsel of record regarding several discovery disputes.	4.20	0.00	\$1,260.00	\$300.00
11/26/2024	107909	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery M A104 Review/i	For Opposition to Rule 37 Motion, review, analyze, edit and provide feedback and direction of full draft of the Brief in Opposition (47 pages).	2.10	1.00	\$630.00	\$300.00
11/28/2024	107912	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery M A103 Draft/rev	For Brief in Opposition to Plaintiff's Rule 37 Motion, review and draft portions of declarations of Ryan Sorenson, Charles Adams and Emily Rendall-Araujo in support of Brief in Opposition.	4.20	0.00	\$1,260.00	\$300.00
11/29/2024	107934	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery M A103 Draft/rev	For Brief in Opposition to Plaintiff's Rule 37 Motion, review, draft and revise arguments responding to the motion to compel portion of Plaintiff's motion.	1.90	0.60	\$570.00	\$300.00
11/29/2024	107933	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery M A103 Draft/rev	Begin drafting the Declaration of Warren Buliox in support of Brief in Opposition to Plaintiff's Rule 37 Motion.	3.90	0.00	\$1,170.00	\$300.00
11/30/2024	108459	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery M A103 Draft/rev	Analyze Plaintiff's list of purported outstanding discovery in Exhibit U of Plaintiff's Motion to Compel to draft appropriate response.	3.50	0.00	\$1,050.00	\$300.00
11/30/2024	108287	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Anthony Jackson	L120 Analysis/St A103 Draft/rev	For Brief in Opposition to Plaintiff's Rule 37 Motion, draft arguments responding to allegations of bad faith on behalf of the City and the City Attorney.	2.00	0.00	\$500.00	\$250.00
11/30/2024	107932	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery M A103 Draft/rev	Continue review and drafting of 48 page Brief in Opposition to Motion for Sanctions.	4.20	0.00	\$1,260.00	\$300.00
12/1/2024	112022	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L240 Dispositive A103 Draft/rev	Draft Declaration of Warren Buliox in Support of Brief in Opposition to Motion for Sanctions	2.10	2.00	\$630.00	\$300.00
12/1/2024	112015	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery M A103 Draft/rev	or to Compel.	7.10	1.00	\$2,130.00	\$300.00
12/1/2024	107937	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Anthony Jackson	L320 Document A103 Draft/rev	Continue to draft response to Plaintiff's Motion for Sanctions and Motion to Compel on issues raised alleging bad faith discovery.	1.40	0.00	\$350.00	\$250.00
12/2/2024	112021	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery M A103 Draft/rev	Continued drafting of Brief in Support of Opposition to Motion for Sanctions.	1.20	3.00	\$360.00	\$300.00
12/2/2024	112018	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery M A103 Draft/rev	Analyze and edit drafts of declarations for Ryan Sorenson, Charles Adams and Emily Rendall in Support of Opposition to Motion for Sanctions.	3.60	0.00	\$1,080.00	\$300.00

12/2/2024	112016	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery ¶ A103 Draft/rev	Continued drafting of Declaration of Warren Buliox in Support of Brief in Opposition to Motion for Sanctions or to Compel.	2.70	2.00	\$810.00	\$300.00
12/2/2024	108883	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Anthony Jackson	L320 Document A103 Draft/rev	Continue to draft response to Plaintiff's Motion for Sanctions and in the alternative Motion to Compel.	1.90	0.00	\$475.00	\$250.00
12/2/2024	108785	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Kerrie Murphy	L350 Discovery ¶ A103 Draft/rev	Edit Defendants Brief in Opposition to Plaintiff's Motion for Sanctions and Motion to Compel.	3.20	0.00	\$960.00	\$300.00
12/2/2024	108749	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Anthony Jackson	L320 Document A103 Draft/rev	Continue to draft response to Plaintiff's Motion for Sanctions and in the alternative Motion to Compel.	2.20	0.00	\$550.00	\$250.00
12/3/2024	112020	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery ¶ A103 Draft/rev	Continued drafting and finalization of 48-page Brief in Support of Opposition to Motion for Sanctions.	4.40	0.00	\$1,320.00	\$300.00
12/3/2024	112019	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery ¶ A103 Draft/rev	Identify, analyze and review exhibits for declarations for Warren Buliox, Ryan Sorenson, Charles Adams and Emily Rendall in Support of Opposition to Motion for Sanctions.	2.50	2.00	\$750.00	\$300.00
12/3/2024	112017	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery ¶ A103 Draft/rev	Finalize draft of Declaration of Warren Buliox in Support of Brief in Opposition to Motion for Sanctions or to Compel.	2.50	0.00	\$750.00	\$300.00
12/3/2024	109167	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Anthony Jackson	L320 Document A103 Draft/rev	Final review and edits to 48-page brief in response to Plaintiff's Motion for Sanctions and in the alternative Motion to Compel.	4.50	0.00	\$1,125.00	\$250.00
12/3/2024	108971	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Anthony Jackson	L120 Analysis/St A104 Review/i	Review Plaintiff's Motion in Opposition to Defendants' Request to File and Oversized Response.	0.10	0.00	\$25.00	\$250.00
12/10/2024	113655	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery ¶ A107 Commur	Review and respond to inquiry from opposing counsel regarding material filed under seal in connection with Defendants' Brief in Opposition to Plaintiff's Motion for Sanctions.	0.40	0.00	\$120.00	\$300.00
12/23/2024	114086	Liberty Mutual Group - City of Sheboygan - Chad Pelishek v. City of Sheboygan et al - 1497.1002	Warren Buliox	L350 Discovery ¶ A104 Review/i	Analyze fact and legal issues raised in Plaintiff's Reply Brief in Support of his Motion for Sanctions to assess the need and/or prospects of a sur-reply.	2.20	0.00	\$660.00	\$300.00
						<b>159.50</b>	<b>20.70</b>	<b>\$ 45,370.00</b>	

Row Labels	Sum of Billable Hrs	Sum of Non Bill Hrs
Anthony Jackson	49.60	6.30
Kerrie Murphy	4.70	0.00
Warren Buliox	105.20	14.40
<b>Grand Total</b>	<b>159.50</b>	<b>20.70</b>